

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:

Case No.: 18-30959-sgj13
Chapter 13

Laskey Carmen Chatham, Jr.,

Debtor.

_____/

**WILMINGTON SAVINGS FUND SOCIETY'S
OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

Comes now the secured creditor, Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, as trustee for Normandy Mortgage Loan Trust, Series 2017-1 (hereinafter "Secured Creditor") by and through Counsel, Brent Martinelli, Esq. of Quintairos, Prieto, Wood & Boyer P.A., and hereby objects to confirmation of the Amended Chapter 13 Plan (ECF No. 38). In support of its Objection, Creditor respectfully shows the Court as follows:

1. Secured Creditor is the holder of the Note and Mortgage for the real property located at 10106 Huffines Dr., Rowlett, TX 75089
2. On January 31, 2007, Debtor who is not a debtor executed a Note and Mortgage for the real property located at 10106 Huffines Dr., Rowlett, TX 750893.
3. On or about March 16, 2018, Debtor filed a Voluntary Petition for Relief under Chapter 13 of the Bankruptcy Code.
4. Pursuant to the Proof of Claim being finalized by the Movant, the monthly mortgage payment should be \$2,342.34 including escrow, and pre-petition arrears are

owed in the amount of \$43,965.27. This Proof of Claim will be filed before the Bar Date of May 25, 2018.

Wherefore, Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, as trustee for Normandy Mortgage Loan Trust, Series 2017-1, respectfully requests confirmation of the Debtor's Amended Chapter 13 Plan be denied as the Debtor does not propose to pay the correct total amount of arrears due or the correct post-petition monthly payment.

Dated: May 23, 2018

Respectfully submitted,

/s / Brent Martinelli

Brent Martinelli, Esq.

Texas Bar No. 24037037

Quintairos, Prieto, Wood & Boyer, PA

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Attorney for Selene Finance LP

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CERTIFICATE OF SERVICE

I certify that I have caused to be served a copy of the foregoing Objection to Confirmation of Amended Chapter 13 Plan, by first class mail, postage prepaid or by CM/ECF electronic filing upon the parties listed below on this day.

Dated: May 23, 2018

/s/ Brent Martinelli
Brent Martinelli, Esq.
Texas Bar No. 24037037

Copies Furnished To:

Debtor: LASKEY CARMEN CHATHAM, 10106 HUFFINES DR, ROWLETT, TX
75089

Attorney: LEINART LAW FIRM, 11520 N CENTRAL EXPRESS WAY, SUITE 212,
DALLAS, TX 75243

Court: CLERK'S OFFICE, US BANKRUPTCY COURT, 1100 COMMERCE ST., 12TH
FLOOR, DALLAS, TEXAS, 75242

Trustee: TRUSTEE'S OFFICE, 125 E. JOHN CARPENTER FREEWAY, SUITE #1100,
IRVING, TEXAS 75062

U.S. Trustee: United States Trustee, 1100 Commerce Street, Room 976, Dallas, TX
75242